

**No. 24-1522**

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IN THE UNITED STATES COURT OF APPEALS  
FOR THE EIGHTH CIRCUIT

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**STATE OF IOWA, *et al.*,**  
*Petitioners,*

**v.**

**UNITED STATES SECURITIES AND EXCHANGE  
COMMISSION,**  
*Respondent.*

**DISTRICT OF COLUMBIA, *et al.*,**  
*Intervenors.*

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Petition for Review of an Order of the  
Securities & Exchange Commission

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**MOTION TO WITHDRAW JONATHAN BERRY AS COUNSEL**

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Jonathan Berry will be leaving his employment with Boyden Gray PLLC and hereby respectfully moves to withdraw as counsel for Petitioner American Free Enterprise Chamber of Commerce in the above captioned case. Petitioner American Free Enterprise Chamber of Commerce will continue to be represented by R. Trent McCotter of Boyden Gray PLLC.

October 20, 2025

Respectfully submitted,

/s/ Jonathan Berry

Jonathan Berry

R. Trent McCotter

*Counsel of Record*

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*Counsel for Petitioner*

*American Free Enterprise*

*Chamber of Commerce*

### **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of this Court using the CM/ECF system, which will serve all parties automatically.

October 20, 2025

/s/ Jonathan Berry  
Jonathan Berry

## **CERTIFICATE OF COMPLIANCE**

I hereby certify that this motion complies with the type-volume limitations of Federal Rule of Appellate Procedure 27(d)(2) because it contains 52 words, excluding the portions exempted. This motion complies with the typeface and type-style requirements of Federal Rule of Appellate Procedure Rule 32(a)(5)–(6) because it has been prepared in a proportionally spaced typeface using Microsoft Word in Century Schoolbook and 14-point font.

I further certify that this PDF has been scanned for viruses and no viruses were detected.

October 20, 2025

/s/ Jonathan Berry  
Jonathan Berry